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CLERK US DISTRICT COURT  
DISTRICT OF ARIZONA

RM(LCK)

CR 17 - 1904 TUC

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

INDICTMENT

United States of America,

Plaintiff,

vs.

(1) Edgar Antonio Casahonda  
Counts 5, 8, 9, 10, 27, 28, 29, 30;

(2) Antonio Adrian Nieto Macias  
Counts 3, 10, 30;

(3) Jose Rodriguez San Miguel  
Counts 3, 5, 6, 7, 10, 30;

(4) Martin Flores  
Counts 1, 2, 11, 12, 13, 14, 15, 16, 17, 18,  
19, 20, 21, 22, 23, 24, 25, 26, 30;

(5) Jesus De La Cruz Moreno  
Counts 8, 9, 30;

(6) Cesar Ernesto Lorea Rubio  
Counts 4, 30;

(7) Francisco Fabian Alexis Romero  
Counts 27, 28, 30;

Defendants.

Violations:

18 U.S.C. § 2(a)  
(Aiding and Abetting the Commission of  
an Offense)  
Counts 3, 5, 8, 9, 10, 27

18 U.S.C. § 371  
(Conspiracy)  
Count 30

18 USC § 554(a); 22 USC § 2778; 22  
CFR §§ 121.1 and 123.1  
(Smuggling Goods From the United  
States)  
Count 28

18 U.S.C. §§ 922(a)(6) and 924(a)(2)  
(False Statements in Connection with  
Acquisition of Firearm)  
Counts 1, 3, 5, 6, 7, 8, 9, 10, 11, 13, 15, 17,  
19, 21, 23, 25, 27

18 U.S.C. § 924(a)(1)(A)  
(False Statement in Record of Federal  
Firearms Licensee)  
Counts 2, 4, 12, 14, 16, 18, 20, 22, 24, 26

18 U.S.C. § 1001(a)(2)  
(False Statements)  
Count 29

18 U.S.C. § 924(d)(1); 18 U.S.C. §  
981(a)(1)(C); and 28 U.S.C. § 2461(c)  
(Forfeiture Allegation)

1 **THE GRAND JURY CHARGES:**

2 **COUNT 1**

3 On or about July 12, 2017, at or near Tucson, in the District of Arizona, MARTIN  
4 FLORES, in connection with the acquisition of firearms, that is; one Century Arms  
5 International, model AK63DS, 7.62x39mm caliber rifle, serial number AK63DS-FO3195;  
6 and one Colt, model M4 Carbine, 5.56mm caliber rifle, serial number LE438999; from  
7 SnG Tactical - SnG Arms, dba Smoke & Glory, a licensed dealer of firearms within the  
8 meaning of Chapter 44, Title 18, United States Code; did knowingly make a false and  
9 fictitious written statement to SnG Tactical - SnG Arms, which statement was intended to  
10 deceive SnG Tactical - SnG Arms as to a fact material to the lawfulness of such sale of  
11 said firearms to MARTIN FLORES under Chapter 44, Title 18, United States Code; in that  
12 MARTIN FLORES stated that he was the actual transferee/buyer of said firearms; in  
13 violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

14 **COUNT 2**

15 On or about July 12, 2017, at or near Tucson, in the District of Arizona, MARTIN  
16 FLORES knowingly made a false statement and representation to SnG Tactical - SnG  
17 Arms, dba Smoke & Glory, licensed under the provisions of Chapter 44, Title 18, United  
18 States Code, with respect to information required by the provisions of Chapter 44, Title 18,  
19 United States Code, to be kept in the records of SnG Tactical - SnG Arms; in that MARTIN  
20 FLORES, in connection with the purchase of firearms, that is one Century Arms  
21 International, model AK63DS, 7.62x39mm caliber rifle, serial number AK63DS-FO3195;  
22 and one Colt, model M4 Carbine, 5.56mm caliber rifle, serial number LE438999; stated  
23 that his address was 57 Chula Vista Lane, Nogales, Arizona; in violation of Title 18, United  
24 States Code, Section 924(a)(1)(A).

25 **COUNT 3**

26 On or about July 12, 2017, at or near Tucson, in the District of Arizona, JOSE  
27 RODRIGUEZ SAN MIGUEL and ANTONIO ADRIAN NIETO MACIAS, in connection  
28 with the acquisition of firearms, that is; one Century Arms International, model N-PAP

1 DF, 7.62x39mm caliber rifle, serial number NPDF011269; and one Colt, model M4  
2 Carbine, 5.56mm caliber rifle, serial number LE561596; from SnG Tactical - SnG Arms,  
3 dba Smoke & Glory, a licensed dealer of firearms within the meaning of Chapter 44, Title  
4 18, United States Code; did knowingly make a false and fictitious written statement to SnG  
5 Tactical - SnG Arms, which statement was intended to deceive SnG Tactical - SnG Arms  
6 as to a fact material to the lawfulness of such sale of said firearms to JOSE RODRIGUEZ  
7 SAN MIGUEL under Chapter 44, Title 18, United States Code; in that JOSE RODRIGUEZ  
8 SAN MIGUEL stated that he was the actual transferee/buyer of said firearms, and  
9 ANTONIO ADRIAN NIETO MACIAS aided, abetted, counseled, commanded, induced,  
10 and procured such false and fictitious statement; in violation of Title 18, United States  
11 Code, Sections 2(a), 922(a)(6), and 924(a)(2).

12 **COUNT 4**

13 On or about July 15, 2017, at or near Avondale, in the District of Arizona, CESAR  
14 ERNESTO LOREA RUBIO knowingly made a false statement and representation to  
15 Sportsman's Warehouse #252, licensed under the provisions of Chapter 44, Title 18,  
16 United States Code, with respect to information required by the provisions of Chapter 44,  
17 Title 18, United States Code, to be kept in the records of Sportsman's Warehouse #252; in  
18 that CESAR ERNESTO LOREA RUBIO, in connection with the purchase of firearms, that  
19 is, one Colt, model M4 Carbine, .223/5.56mm caliber rifle, serial number LE561074; stated  
20 that his address was 2242 N. Escuela View, Nogales, Arizona; in violation of Title 18,  
21 United States Code, Section 924(a)(1)(A).

22 **COUNT 5**

23 On or about July 15, 2017, at or near Phoenix, in the District of Arizona, JOSE  
24 RODRIGUEZ SAN MIGUEL and EDGAR ANTONIO CASAHONDA, in connection  
25 with the acquisition of a firearm, that is; one Century Arms International, model N-PAP,  
26 7.62x39 mm caliber rifle, serial number NPDF010953; from Ammo AZ, a licensed dealer  
27 of firearms within the meaning of Chapter 44, Title 18, United States Code; did knowingly  
28 make a false and fictitious written statement to Ammo AZ, which statement was intended

1 to deceive Ammo AZ as to a fact material to the lawfulness of such sale of said firearm to  
2 JOSE RODRIGUEZ SAN MIGUEL under Chapter 44, Title 18, United States Code; in  
3 that JOSE RODRIGUEZ SAN MIGUEL stated that he was the actual transferee/buyer of  
4 said firearm, and EDGAR ANTONIO CASAHONDA aided, abetted, counseled,  
5 commanded, induced, and procured such false and fictitious statement; in violation of Title  
6 18, United States Code, Sections 2(a), 922(a)(6), and 924(a)(2).

7 **COUNT 6**

8 On or about July 16, 2017, at or near Avondale, in the District of Arizona, JOSE  
9 RODRIGUEZ SAN MIGUEL, in connection with the attempted acquisition of a firearm,  
10 that is; one Colt, model M4 Carbine, .223/5.56mm caliber rifle, serial number LE560940;  
11 from Sportsman's Warehouse #252, a licensed dealer of firearms within the meaning of  
12 Chapter 44, Title 18, United States Code; did knowingly make a false and fictitious written  
13 statement to Sportsman's Warehouse #252, which statement was intended to deceive  
14 Sportsman's Warehouse #252 as to a fact material to the lawfulness of such sale of said  
15 firearm to JOSE RODRIGUEZ SAN MIGUEL under Chapter 44, Title 18, United States  
16 Code; in that JOSE RODRIGUEZ SAN MIGUEL stated that he was the actual  
17 transferee/buyer of said firearm; in violation of Title 18, United States Code, Sections  
18 922(a)(6) and 924(a)(2).

19 **COUNT 7**

20 On or about July 16, 2017, at or near Tucson, in the District of Arizona, JOSE  
21 RODRIGUEZ SAN MIGUEL, in connection with the attempted acquisition of a firearm,  
22 that is; one Colt, model M4 Carbine, .223/5.56mm caliber rifle, serial number LE510229;  
23 from Sportsman's Warehouse #132, a licensed dealer of firearms within the meaning of  
24 Chapter 44, Title 18, United States Code; did knowingly make a false and fictitious written  
25 statement to Sportsman's Warehouse #132, which statement was intended to deceive  
26 Sportsman's Warehouse #132 as to a fact material to the lawfulness of such sale of said  
27 firearm to JOSE RODRIGUEZ SAN MIGUEL under Chapter 44, Title 18, United States  
28 Code; in that JOSE RODRIGUEZ SAN MIGUEL stated that he was the actual

1 transferee/buyer of said firearm; in violation of Title 18, United States Code, Sections  
2 922(a)(6) and 924(a)(2).

3 **COUNT 8**

4 On or about July 18, 2017, at or near Tucson, in the District of Arizona, JESUS DE  
5 LA CRUZ MORENO and EDGAR ANTONIO CASAHONDA, in connection with the  
6 acquisition of a firearm, that is; one Colt, model M4 Carbine, .223/5.56mm caliber rifle,  
7 serial number LE510229; from Sportsman's Warehouse #132, a licensed dealer of firearms  
8 within the meaning of Chapter 44, Title 18, United States Code; did knowingly make a  
9 false and fictitious written statement to Sportsman's Warehouse #132, which statement  
10 was intended to deceive Sportsman's Warehouse #132 as to a fact material to the  
11 lawfulness of such sale of said firearm to JESUS DE LA CRUZ MORENO under Chapter  
12 44, Title 18, United States Code; in that JESUS DE LA CRUZ MORENO stated that he  
13 was the actual transferee/buyer of said firearm, and EDGAR ANTONIO CASAHONDA  
14 aided, abetted, counseled, commanded, induced, and procured such false and fictitious  
15 statement; in violation of Title 18, United States Code, Sections 2(a), 922(a)(6), and  
16 924(a)(2).

17 **COUNT 9**

18 On or about July 18, 2017, at or near Tucson, in the District of Arizona, JESUS DE  
19 LA CRUZ MORENO and EDGAR ANTONIO CASAHONDA, in connection with the  
20 acquisition of a firearm, that is; one Century Arms International, model AK63DS,  
21 7.62x39mm caliber rifle, serial number AK63DS-F04552; from Second Amendment  
22 Sports, Inc., a licensed dealer of firearms within the meaning of Chapter 44, Title 18,  
23 United States Code; did knowingly make a false and fictitious written statement to Second  
24 Amendment Sports, Inc., which statement was intended to deceive Second Amendment  
25 Sports, Inc. as to a fact material to the lawfulness of such sale of said firearm to JESUS DE  
26 LA CRUZ MORENO under Chapter 44, Title 18, United States Code; in that JESUS DE  
27 LA CRUZ MORENO stated that he was the actual transferee/buyer of said firearm, and  
28 EDGAR ANTONIO CASAHONDA aided, abetted, counseled, commanded, induced, and

1 procured such false and fictitious statement; in violation of Title 18, United States Code,  
2 Sections 2(a), 922(a)(6), and 924(a)(2).

3 **COUNT 10**

4 On or about July 24, 2017, at or near Tucson, in the District of Arizona, JOSE  
5 RODRIGUEZ SAN MIGUEL, EDGAR ANTONIO CASAHONDA and ANTONIO  
6 ADRIAN NIETO MACIAS, in connection with the acquisition of a firearm, that is; one  
7 Colt, model LE6920, 5.56mm caliber rifle, serial number LE416962; from R&A Tactical,  
8 LLC, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United  
9 States Code; did knowingly make a false and fictitious written statement to R&A Tactical,  
10 LLC, which statement was intended to deceive R&A Tactical, LLC as to a fact material to  
11 the lawfulness of such sale of said firearm to JOSE RODRIGUEZ SAN MIGUEL under  
12 Chapter 44, Title 18, United States Code; in that JOSE RODRIGUEZ SAN MIGUEL  
13 stated that he was the actual transferee/buyer of said firearm, and EDGAR ANTONIO  
14 CASAHONDA and ANTONIO ADRIAN NIETO MACIAS aided, abetted, counseled,  
15 commanded, induced, and procured such false and fictitious statement; in violation of Title  
16 18, United States Code, Sections 2(a), 922(a)(6), and 924(a)(2).

17 **COUNT 11**

18 On or about July 24, 2017, at or near Tucson, in the District of Arizona, MARTIN  
19 FLORES, in connection with the acquisition of a firearm, that is; one Colt, model LE6920,  
20 5.56mm caliber rifle, serial number LE413704; from R&A Tactical, LLC, a licensed dealer  
21 of firearms within the meaning of Chapter 44, Title 18, United States Code; did knowingly  
22 make a false and fictitious written statement to R&A Tactical, LLC, which statement was  
23 intended to deceive R&A Tactical, LLC as to a fact material to the lawfulness of such sale  
24 of said firearm to MARTIN FLORES under Chapter 44, Title 18, United States Code; in  
25 that MARTIN FLORES stated that he was the actual transferee/buyer of said firearm; in  
26 violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

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1 **COUNT 12**

2 On or about July 24, 2017, at or near Tucson, in the District of Arizona, MARTIN  
3 FLORES knowingly made a false statement and representation to R&A Tactical, LLC,  
4 licensed under the provisions of Chapter 44, Title 18, United States Code, with respect to  
5 information required by the provisions of Chapter 44, Title 18, United States Code, to be  
6 kept in the records of R&A Tactical, LLC; in that MARTIN FLORES, in connection with  
7 the purchase of a firearm, that is; one Colt, model LE6920, 5.56mm caliber rifle, serial  
8 number LE413704; stated that his address was 57 Chula Vista Lane, Nogales, Arizona; in  
9 violation of Title 18, United States Code, Section 924(a)(1)(A).

10 **COUNT 13**

11 On or about August 2, 2017, at or near Tucson, in the District of Arizona, MARTIN  
12 FLORES, in connection with the acquisition of a firearm, that is; one Colt, model M4  
13 Carbine, 5.56mm caliber rifle, serial number LE561836; from SnG Tactical - SnG Arms,  
14 dba Smoke & Glory, a licensed dealer of firearms within the meaning of Chapter 44, Title  
15 18, United States Code; did knowingly make a false and fictitious written statement to SnG  
16 Tactical - SnG Arms, which statement was intended to deceive SnG Tactical - SnG Arms  
17 as to a fact material to the lawfulness of such sale of said firearm to MARTIN FLORES  
18 under Chapter 44, Title 18, United States Code; in that MARTIN FLORES stated that he  
19 was the actual transferee/buyer of said firearm; in violation of Title 18, United States Code,  
20 Sections 922(a)(6) and 924(a)(2).

21 **COUNT 14**

22 On or about August 2, 2017, at or near Tucson, in the District of Arizona, MARTIN  
23 FLORES knowingly made a false statement and representation to SnG Tactical - SnG  
24 Arms, dba Smoke & Glory, licensed under the provisions of Chapter 44, Title 18, United  
25 States Code, with respect to information required by the provisions of Chapter 44, Title 18,  
26 United States Code, to be kept in the records of SnG Tactical - SnG Arms; in that MARTIN  
27 FLORES, in connection with the purchase of a firearm, that is; one Colt, model M4  
28 Carbine, 5.56mm caliber rifle, serial number LE561836; stated that his address was 57

1 Chula Vista Lane, Nogales, Arizona; in violation of Title 18, United States Code, Section  
2 924(a)(1)(A).

3 **COUNT 15**

4 On or about August 2, 2017, at or near Tucson, in the District of Arizona, MARTIN  
5 FLORES, in connection with the acquisition of a firearm, that is; one Colt, model LE6920,  
6 5.56mm caliber rifle, serial number LE413797; from R&A Tactical, LLC, a licensed dealer  
7 of firearms within the meaning of Chapter 44, Title 18, United States Code; did knowingly  
8 make a false and fictitious written statement to R&A Tactical, LLC, which statement was  
9 intended to deceive R&A Tactical, LLC as to a fact material to the lawfulness of such sale  
10 of said firearm to MARTIN FLORES under Chapter 44, Title 18, United States Code; in  
11 that MARTIN FLORES stated that he was the actual transferee/buyer of said firearm; in  
12 violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

13 **COUNT 16**

14 On or about August 2, 2017, at or near Tucson, in the District of Arizona, MARTIN  
15 FLORES knowingly made a false statement and representation to R&A Tactical, LLC,  
16 licensed under the provisions of Chapter 44, Title 18, United States Code, with respect to  
17 information required by the provisions of Chapter 44, Title 18, United States Code, to be  
18 kept in the records of R&A Tactical, LLC; in that MARTIN FLORES, in connection with  
19 the purchase of a firearm, that is; one Colt, model LE6920, 5.56mm caliber rifle, serial  
20 number LE413797; stated that his address was 57 Chula Vista Lane, Nogales, Arizona; in  
21 violation of Title 18, United States Code, Section 924(a)(1)(A).

22 **COUNT 17**

23 On or about August 11, 2017, at or near Tucson, in the District of Arizona, MARTIN  
24 FLORES, in connection with the acquisition of a firearm, that is; one Colt, model M4  
25 Carbine, .223/5.56mm caliber rifle, serial number LE564127; from Sportsman's  
26 Warehouse #132, a licensed dealer of firearms within the meaning of Chapter 44, Title 18,  
27 United States Code; did knowingly make a false and fictitious written statement to  
28 Sportsman's Warehouse #132, which statement was intended to deceive Sportsman's



1 Warehouse #132 as to a fact material to the lawfulness of such sale of said firearm to  
2 MARTIN FLORES under Chapter 44, Title 18, United States Code; in that MARTIN  
3 FLORES stated that he was the actual transferee/buyer of said firearm; in violation of Title  
4 18, United States Code, Sections 922(a)(6) and 924(a)(2).

5 **COUNT 18**

6 On or about August 11, 2017, at or near Tucson, in the District of Arizona, MARTIN  
7 FLORES knowingly made a false statement and representation to Sportsman's Warehouse  
8 #132, licensed under the provisions of Chapter 44, Title 18, United States Code, with  
9 respect to information required by the provisions of Chapter 44, Title 18, United States  
10 Code, to be kept in the records of Sportsman's Warehouse #132; in that MARTIN  
11 FLORES, in connection with the purchase of a firearm, that is; one Colt, model M4  
12 Carbine, .223/5.56mm caliber rifle, serial number LE564127; stated that his address was  
13 57 Chula Vista Lane, Nogales, Arizona; in violation of Title 18, United States Code,  
14 Section 924(a)(1)(A).

15 **COUNT 19**

16 On or about August 24, 2017, at or near Tucson, in the District of Arizona, MARTIN  
17 FLORES, in connection with the acquisition of a firearm, that is; one Century Arms  
18 International, model N-PAP, 7.62x39mm caliber rifle, serial number N-PAP056740; from  
19 SnG Tactical - SnG Arms, dba Smoke & Glory, a licensed dealer of firearms within the  
20 meaning of Chapter 44, Title 18, United States Code; did knowingly make a false and  
21 fictitious written statement to SnG Tactical - SnG Arms, which statement was intended to  
22 deceive SnG Tactical - SnG Arms as to a fact material to the lawfulness of such sale of  
23 said firearm to MARTIN FLORES under Chapter 44, Title 18, United States Code; in that  
24 MARTIN FLORES stated that he was the actual transferee/buyer of said firearm; in  
25 violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

26 **COUNT 20**

27 On or about August 24, 2017, at or near Tucson, in the District of Arizona, MARTIN  
28 FLORES knowingly made a false statement and representation to SnG Tactical - SnG

1 Arms, dba Smoke & Glory, licensed under the provisions of Chapter 44, Title 18, United  
2 States Code, with respect to information required by the provisions of Chapter 44, Title 18,  
3 United States Code, to be kept in the records of SnG Tactical - SnG Arms; in that MARTIN  
4 FLORES, in connection with the purchase of firearms, that is; one Century Arms  
5 International, model N-PAP, 7.62x39mm caliber rifle, serial number N-PAP056740; stated  
6 that his address was 57 Chula Vista Lane, Nogales, Arizona; in violation of Title 18, United  
7 States Code, Section 924(a)(1)(A).

8 **COUNT 21**

9 On or about August 25, 2017, at or near Tucson, in the District of Arizona, MARTIN  
10 FLORES, in connection with the acquisition of a firearm, that is; one Colt, model 6920,  
11 5.56mm caliber rifle, serial number LE452151; from Glockmeister, a licensed dealer of  
12 firearms within the meaning of Chapter 44, Title 18, United States Code; did knowingly  
13 make a false and fictitious written statement to Glockmeister, which statement was  
14 intended to deceive Glockmeister as to a fact material to the lawfulness of such sale of said  
15 firearm to MARTIN FLORES under Chapter 44, Title 18, United States Code; in that  
16 MARTIN FLORES stated that he was the actual transferee/buyer of said firearm; in  
17 violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

18 **COUNT 22**

19 On or about August 25, 2017, at or near Tucson, in the District of Arizona, MARTIN  
20 FLORES knowingly made a false statement and representation to Glockmeister, licensed  
21 under the provisions of Chapter 44, Title 18, United States Code, with respect to  
22 information required by the provisions of Chapter 44, Title 18, United States Code, to be  
23 kept in the records of Glockmeister; in that MARTIN FLORES, in connection with the  
24 purchase of firearms, that is; one Colt, model 6920, 5.56mm caliber rifle, serial number  
25 LE452151; stated that his address was 57 Chula Vista Lane, Nogales, Arizona; in violation  
26 of Title 18, United States Code, Section 924(a)(1)(A).

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1 **COUNT 23**

2 On or about August 31, 2017, at or near Tucson, in the District of Arizona, MARTIN  
3 FLORES, in connection with the acquisition of a firearm, that is; one Century Arms  
4 International, model RAS47, 7.62x39mm caliber rifle, serial number RAS47085010; from  
5 Liberty Pawn Shop, a licensed dealer of firearms within the meaning of Chapter 44, Title  
6 18, United States Code; did knowingly make a false and fictitious written statement to  
7 Liberty Pawn Shop, which statement was intended to deceive Liberty Pawn Shop as to a  
8 fact material to the lawfulness of such sale of the said firearm to MARTIN FLORES under  
9 Chapter 44, Title 18, United States Code; in that MARTIN FLORES stated that he was the  
10 actual transferee/buyer of said firearm; in violation of Title 18, United States Code,  
11 Sections 922(a)(6) and 924(a)(2).

12 **COUNT 24**

13 On or about August 31, 2017, at or near Tucson, in the District of Arizona, MARTIN  
14 FLORES knowingly made a false statement and representation to Liberty Pawn Shop,  
15 licensed under the provisions of Chapter 44, Title 18, United States Code, with respect to  
16 information required by the provisions of Chapter 44, Title 18, United States Code, to be  
17 kept in the records of Liberty Pawn Shop; in that MARTIN FLORES, in connection with  
18 the purchase of firearms, that is; one Century Arms International, model RAS47,  
19 7.62x39mm caliber rifle, serial number RAS47085010; stated that his address was 57  
20 Chula Vista Lane, Nogales, Arizona; in violation of Title 18, United States Code, Section  
21 924(a)(1)(A).

22 **COUNT 25**

23 On or about September 11, 2017, at or near Tucson, in the District of Arizona,  
24 MARTIN FLORES, in connection with the acquisition of a firearm, that is; one Colt, model  
25 M4 Carbine, 5.56mm caliber rifle, serial number LE514694; from SnG Tactical - SnG  
26 Arms, dba Smoke & Glory, a licensed dealer of firearms within the meaning of Chapter  
27 44, Title 18, United States Code; did knowingly make a false and fictitious written  
28 statement to SnG Tactical - SnG Arms, which statement was intended to deceive SnG

1 Tactical - SnG Arms as to a fact material to the lawfulness of such sale of said firearm to  
2 MARTIN FLORES under Chapter 44, Title 18, United States Code; in that MARTIN  
3 FLORES stated that he was the actual transferee/buyer of said firearm; in violation of Title  
4 18, United States Code, Sections 922(a)(6) and 924(a)(2).

5 **COUNT 26**

6 On or about September 11, 2017, at or near Tucson, in the District of Arizona,  
7 MARTIN FLORES knowingly made a false statement and representation to SnG Tactical  
8 - SnG Arms, dba Smoke & Glory, licensed under the provisions of Chapter 44, Title 18,  
9 United States Code, with respect to information required by the provisions of Chapter 44,  
10 Title 18, United States Code, to be kept in the records of SnG Tactical - SnG Arms; in that  
11 MARTIN FLORES, in connection with the purchase of firearms, that is; one Colt, model  
12 M4 Carbine, 5.56mm caliber rifle, serial number LE514694; stated that his address was 57  
13 Chula Vista Lane, Nogales, Arizona; in violation of Title 18, United States Code, Section  
14 924(a)(1)(A).

15 **COUNT 27**

16 On or about September 12, 2017, at or near Tucson, in the District of Arizona,  
17 EDGAR ANTONIO CASAHONDA and FRANCISCO FABIAN ALEXIS ROMERO,  
18 in connection with the acquisition of firearms, that is; one Century Arms International,  
19 model N-PAP M70, 7.62x39mm caliber rifle, serial number NPAP059675; one Century  
20 Arms International, model RAS47, 7.62x39mm caliber rifle, serial number RAS47068773;  
21 one Century Arms International, model AK-63DS, 7.62x39mm caliber rifle, serial number  
22 AK63DSF04400; and one Century Arms International, model RAS47, 7.62x39mm caliber  
23 pistol, serial number RAS47P001939; from R&A Tactical, LLC, a licensed dealer of  
24 firearms within the meaning of Chapter 44, Title 18, United States Code; did knowingly  
25 make a false and fictitious written statement to R&A Tactical, LLC, which statement was  
26 intended to deceive R&A Tactical, LLC as to a fact material to the lawfulness of such sale  
27 of said firearms to FRANCISCO FABIAN ALEXIS ROMERO under Chapter 44, Title  
28 18, United States Code; in that FRANCISCO FABIAN ALEXIS ROMERO stated that

1 he was the actual transferee/buyer of said firearms; and EDGAR ANTONIO  
2 CASAHONDA aided, abetted, counseled, commanded, induced, and procured such false  
3 and fictitious statement; in violation of Title 18, United States Code, Sections 2(a),  
4 922(a)(6) and 924(a)(2).

5 **COUNT 28**

6 On or about September 12, 2017, at or near Tucson, in the District of Arizona,  
7 EDGAR ANTONIO CASAHONDA and FRANCISCO FABIAN ALEXIS ROMERO  
8 knowingly attempted to export and send from the United States any merchandise, article,  
9 or object contrary to any law or regulation of the United States, and received, concealed,  
10 bought, sold, and in any manner facilitated the transportation, concealment, and sale of  
11 such merchandise, article or object, that is; one Century Arms International, model N-PAP  
12 M70, 7.62x39mm caliber rifle, serial number NPAP059675; one Century Arms  
13 International, model RAS47, 7.62x39mm caliber rifle, serial number RAS47068773; one  
14 Century Arms International, model AK-63DS, 7.62x39mm caliber rifle, serial number  
15 AK63DSF04400; and one Century Arms International, model RAS47, 7.62x39mm caliber  
16 pistol, serial number RAS47P001939; knowing the same to be intended for exportation  
17 contrary to any law or regulation of the United States, to wit: Title 22, United States Code,  
18 Section 2778; Title 22, Code of Federal Regulations, Part 121.1; and Title 22, Code of  
19 Federal Regulations, Part 123.1; in violation of Title 18, United States Code, Section  
20 554(a).

21 **COUNT 29**

22 On or about November 6, 2017, at or near Nogales, in the District of Arizona,  
23 EDGAR ANTONIO CASAHONDA knowingly and willfully made any materially false,  
24 fictitious, and fraudulent statement and misrepresentation in any matter within the  
25 jurisdiction of the Government of the United States; to wit, in the course of an investigation  
26 by the United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms and  
27 Explosives, EDGAR ANTONIO CASAHONDA denied his true identity and provided a  
28 false name; in violation of Title 18, United States Code, Section 1001(a)(2).

1  
2 **COUNT 30**

3 From a time unknown to on or about November 6, 2017, at or near Tucson, Phoenix,  
4 Avondale, and elsewhere within the District of Arizona, the defendants, EDGAR  
5 ANTONIO CASAHONDA, ANTONIO ADRIAN NIETO MACIAS, JOSE  
6 RODRIGUEZ SAN MIGUEL, MARTIN FLORES, JESUS DE LA CRUZ MORENO,  
7 CESAR ERNESTO LOREA RUBIO, and FRANCISCO FABIAN ALEXIS ROMERO,  
8 did knowingly and intentionally combine, conspire, confederate, and agree together and  
9 with persons known and unknown to the grand jury, to commit offenses against the United  
10 States, that is: knowingly making false and fictitious written statements to federally  
11 licensed firearms dealers, which statements were intended to deceive the federally licensed  
12 firearms dealers as to a fact material to the lawfulness of such sale of the said firearm under  
13 Chapter 44, Title 18, United States Code; in violation of Title 18, United States Code,  
14 Sections 922(a)(6) and 924(a)(2).

15 **Purpose of the Conspiracy**

16 The purpose of this conspiracy was to unlawfully acquire firearms on behalf of  
17 other individuals by making false statements and representations in the records required by  
18 law to be kept by federally licensed firearms dealers; specifically, which regard to the  
19 purchase of each firearm, that the individual completing the record was the actual  
20 transferee/buyer of the firearm and was not acquiring the firearm on behalf of another  
21 person, when in fact the individual completing the record was acquiring the firearm on  
22 behalf of another person. The firearms acquired in this manner included:

- 23 • Century Arms International, model AK63DS, 7.62x39mm caliber rifle, serial  
24 number AK63DS-FO3195  
25 • Colt, model M4 Carbine, 5.56mm caliber rifle, serial number LE438999  
26 • Century Arms International, model N-PAP DF, 7.62x39mm caliber rifle, serial  
27 number NPDP011269  
28 • Colt, model M4 Carbine, 5.56mm caliber rifle, serial number LE561596  
• Colt, model M4 Carbine, .223/5.56mm caliber rifle, serial number LE561074  
• Century Arms International, model N-PAP, 7.62x39 mm caliber rifle, serial number  
NPDP010953  
• Colt, model M4 Carbine, .223/5.56mm caliber rifle, serial number LE560940  
• Colt, model M4 Carbine, .223/5.56mm caliber rifle, serial number LE510229

- Century Arms International, model AK63DS, 7.62x39mm caliber rifle, serial number AK63DS-F04552
- Colt, model LE6920, 5.56mm caliber rifle, serial number LE416962
- Colt, model LE6920, 5.56mm caliber rifle, serial number LE413704
- Colt, model M4 Carbine, 5.56mm caliber rifle, serial number LE561836
- Colt, model LE6920, 5.56mm caliber rifle, serial number LE413797
- Colt, model M4 Carbine, .223/5.56mm caliber rifle, serial number LE564127
- Century Arms International, model N-PAP, 7.62x39mm caliber rifle, serial number N-PAP056740
- Colt, model 6920, 5.56mm caliber rifle, serial number LE452151
- Century Arms International, model RAS47, 7.62x39mm caliber rifle, serial number RAS47085010
- Colt, model M4 Carbine, 5.56mm caliber rifle, serial number LE514694
- Century Arms International, model N-PAP M70, 7.62x39mm caliber rifle, serial number NPAP059675
- Century Arms International, model RAS47, 7.62x39mm caliber rifle, serial number RAS47068773
- Century Arms International, model AK-63DS, 7.62x39mm caliber rifle, serial number AK63DSF04400
- Century Arms International, model RAS47, 7.62x39mm caliber pistol, serial number RAS47P001939

### **The Means and Methods of the Conspiracy**

The means and methods employed by the defendants and their co-conspirators to carry out the conspiracy and effect its unlawful objects are as follows:

It was part of the conspiracy that certain defendants would purchase firearms from federally licensed firearms dealers in the District of Arizona.

It was a further part of the conspiracy that these defendants would purchase the firearms on behalf of other defendants and/or co-conspirators.

It was a further part of the conspiracy that, in purchasing the firearms, these defendants would make false statements and representations to the federally licensed firearms dealers, in that in connection with each purchase, the purchasing defendant would state that he was the actual transferee/buyer of the firearm(s).

It was a further part of the conspiracy that certain defendants and/or co-conspirators would provide the funds and directions to the purchasing defendants to purchase each of the firearms involved in the conspiracy.

It was a further part of the conspiracy that certain defendants and/or co-conspirators would provide vehicles for use in the purchase of the firearms, and/or would

1 transport other defendants to the businesses of the federally licensed firearms dealers in  
2 order to purchase the firearms.

3 It was a further part of the conspiracy that, following each firearm purchase, the  
4 purchasing defendant would transfer possession of the firearm(s) to other defendants or co-  
5 conspirators.

### 6 Overt Acts

7 In furtherance of the conspiracy, one or more of the co-conspirators committed,  
8 or caused to be committed, the overt acts described below:

9 On July 12, 2017, in Tucson, MARTIN FLORES purchased two firearms from a  
10 federally licensed firearms dealer, and represented that he was the actual purchaser of the  
11 firearms when in fact he was acquiring the firearms on behalf of other defendants and co-  
12 conspirators. In connection with this purchase, MARTIN FLORES also provided a false  
13 address to further conceal the conspiracy. EDGAR ANTONIO CASAHONDA  
14 transported MARTIN FLORES to the business of the federally licensed firearms dealer to  
15 purchase the firearms. ANTONIO ADRIAN NIETO MACIAS provided MARTIN  
16 FLORES a false bill of sale for the firearms to further conceal the conspiracy.

17 Also on July 12, 2017, in Tucson, JOSE RODRIGUEZ SAN MIGUEL purchased  
18 two firearms from a federally licensed firearms dealer, and represented that he was the  
19 actual purchaser of the firearms when in fact he was acquiring the firearms on behalf of  
20 ANTONIO ADRIAN NIETO MACIAS and EDGAR ANTONIO CASAHONDA.  
21 Furthermore, EDGAR ANTONIO CASAHONDA provided JOSE RODRIGUEZ SAN  
22 MIGUEL the funds for the purchase of the firearms, and ANTONIO ADRIAN NIETO  
23 MACIAS provided JOSE RODRIGUEZ SAN MIGUEL a false bill of sale for the firearms  
24 to further conceal the conspiracy.

25 On July 15, 2017, in Avondale, CESAR ERNESTO LOREA RUBIO purchased a  
26 firearm from a federally licensed firearms dealer, and in connection with the purchase, he  
27 provided a false address to further conceal the conspiracy. EDGAR ANTONIO  
28 CASAHONDA and JOSE RODRIGUEZ SAN MIGUEL were present in the business of



1 the federally licensed firearms dealer at the time CESAR ERNESTO LOREA RUBIO  
2 purchased the firearm.

3 Also on July 15, 2017, in Phoenix, in the District of Arizona, JOSE RODRIGUEZ  
4 SAN MIGUEL purchased a firearm from a federally licensed firearms dealer, and  
5 represented that he was the actual purchaser of the firearm when in fact he was acquiring  
6 the firearm on behalf of EDGAR ANTONIO CASAHONDA. Furthermore, EDGAR  
7 ANTONIO CASAHONDA provided JOSE RODRIGUEZ SAN MIGUEL the funds for  
8 the purchase of the firearm, gave JOSE RODRIGUEZ SAN MIGUEL directions for the  
9 purchase of the firearm, and transported JOSE RODRIGUEZ SAN MIGUEL to the  
10 business of the federally licensed firearms dealer to purchase the firearm.

11 On July 16, 2017, in Avondale, JOSE RODRIGUEZ SAN MIGUEL attempted to  
12 purchase a firearm from a federally licensed firearms dealer, and represented that he was  
13 the actual purchaser of the firearm. An employee of the federally licensed firearms dealer  
14 recognized JOSE RODRIGUEZ SAN MIGUEL as having been present with CESAR  
15 ERNESTO LOREA RUBIO and EDGAR ANTONIO CASAHONDA at the same  
16 federally licensed firearms dealer the previous day, when ERNESTO LOREA RUBIO  
17 purchased the same type of firearm JOSE RODRIGUEZ SAN MIGUEL was attempting  
18 to purchase. Later the same date, in Tucson, JOSE RODRIGUEZ SAN MIGUEL  
19 attempted to purchase the same type of firearm from a federally licensed firearms dealer,  
20 and represented that he was the actual purchaser of the firearm.

21 On July 18, 2017, in Tucson, JESUS DE LA CRUZ MORENO purchased a firearm  
22 from a federally licensed firearms dealer, and represented that he was the actual purchaser  
23 of the firearm when in fact he was acquiring the firearm on behalf of EDGAR ANTONIO  
24 CASAHONDA. This was the exact firearm JOSE RODRIGUEZ SAN MIGUEL  
25 attempted to purchase from the federally licensed firearms dealer in Tucson on July 16,  
26 2017. On the same date, JESUS DE LA CRUZ MORENO purchased another firearm from  
27 another federally licensed firearms dealer in Tucson, and represented that he was the actual  
28 purchaser of the firearm when in fact he was also acquiring this firearm on behalf of

1 EDGAR ANTONIO CASAHONDA. Furthermore, EDGAR ANTONIO CASAHONDA  
2 provided the funds to JESUS DE LA CRUZ MORENO for the purchases of both firearms,  
3 gave JESUS DE LA CRUZ MORENO directions for the purchases of the firearms, and  
4 transported JOSE RODRIGUEZ SAN MIGUEL to the businesses of the federally licensed  
5 firearms dealers to purchase the firearms. JOSE RODRIGUEZ SAN MIGUEL was also  
6 also present during these firearm purchases.

7 On July 24, 2017, in Tucson, JOSE RODRIGUEZ SAN MIGUEL purchased a  
8 firearm from a federally licensed firearms dealer, and represented that he was the actual  
9 purchaser of the firearm when in fact he was acquiring the firearm on behalf of EDGAR  
10 ANTONIO CASAHONDA and ANTONIO ADRIAN NIETO MACIAS. Furthermore,  
11 ANTONIO ADRIAN NIETO MACIAS provided EDGAR ANTONIO CASAHONDA the  
12 funds for the purchase of the firearm. EDGAR ANTONIO CASAHONDA then provided  
13 the funds to JOSE RODRIGUEZ SAN MIGUEL, gave JOSE RODRIGUEZ SAN  
14 MIGUEL directions for the purchase of the firearm, and transported JOSE RODRIGUEZ  
15 SAN MIGUEL to the business of the federally licensed firearms dealer to purchase the  
16 firearm. MARTIN FLORES was also present during this firearm purchase. ANTONIO  
17 ADRIAN NIETO MACIAS also provided JOSE RODRIGUEZ SAN MIGUEL a false bill  
18 of sale for the firearm to further conceal the conspiracy.

19 Also on July 24, 2017, in Tucson, MARTIN FLORES purchased a firearm from a  
20 federally licensed firearms dealer, and represented that he was the actual purchaser of the  
21 firearm when in fact he was acquiring the firearm on behalf of other defendants and co-  
22 conspirators. In connection with this purchase, MARTIN FLORES also provided a false  
23 address to further conceal the conspiracy. EDGAR ANTONIO CASAHONDA  
24 transported MARTIN FLORES to the business of the federally licensed firearms dealer to  
25 purchase the firearm. ANTONIO ADRIAN NIETO MACIAS provided MARTIN  
26 FLORES a false bill of sale for the firearm to further conceal the conspiracy.

27 On July 27, 2017, in Arizona, EDGAR ANTONIO CASAHONDA, JOSE  
28 RODRIGUEZ SAN MIGUEL, and JESUS DE LA CRUZ MORENO were encountered

1 together in a vehicle. Also found in the vehicle was \$8,600 in cash and receipts for the  
2 firearm purchases made by JESUS DE LA CRUZ MORENO on July 15 and 24, 2017. It  
3 was the intention of EDGAR ANTONIO CASAHONDA, JOSE RODRIGUEZ SAN  
4 MIGUEL, and JESUS DE LA CRUZ MORENO to purchase firearms on July 27, 2017.

5 On August 2, 2017, in Tucson, MARTIN FLORES purchased two firearms from  
6 two separate federally licensed firearms dealers, and represented that he was the actual  
7 purchaser of the firearms when in fact he was acquiring the firearms on behalf of other  
8 defendants and co-conspirators. In connection with these purchases, MARTIN FLORES  
9 also provided a false address to further conceal the conspiracy. EDGAR ANTONIO  
10 CASAHONDA transported MARTIN FLORES to the business of the federally licensed  
11 firearms dealer to purchase the firearm.

12 On August 11, 2017, in Tucson, MARTIN FLORES purchased a firearm from a  
13 federally licensed firearms dealer, and represented that he was the actual purchaser of the  
14 firearm when in fact he was acquiring the firearm on behalf of other defendants and co-  
15 conspirators. In connection with this purchase, MARTIN FLORES also provided a false  
16 address to further conceal the conspiracy. EDGAR ANTONIO CASAHONDA provided  
17 MARTIN FLORES with the funds to purchase the firearm, and transported MARTIN  
18 FLORES to the business of the federally licensed firearms dealer to purchase the firearm.

19 On August 24, 2017, in Tucson, MARTIN FLORES purchased a firearm from a  
20 federally licensed firearms dealer, and represented that he was the actual purchaser of the  
21 firearm when in fact he was acquiring the firearm on behalf of other defendants and co-  
22 conspirators. In connection with this purchase, MARTIN FLORES also provided a false  
23 address to further conceal the conspiracy. EDGAR ANTONIO CASAHONDA  
24 transported MARTIN FLORES to the business of the federally licensed firearms dealer to  
25 purchase the firearm.

26 On August 25, 2017, in Tucson, MARTIN FLORES purchased a firearm from a  
27 federally licensed firearms dealer, and represented that he was the actual purchaser of the  
28 firearm when in fact he was acquiring the firearm on behalf of other defendants and co-

1 conspirators. In connection with this purchase, MARTIN FLORES also provided a false  
2 address to further conceal the conspiracy. EDGAR ANTONIO CASAHONDA provided  
3 MARTIN FLORES with the funds to purchase the firearm, and transported MARTIN  
4 FLORES to the business of the federally licensed firearms dealer to purchase the firearm.

5 On August 31, 2017, in Tucson, MARTIN FLORES purchased a firearm from a  
6 federally licensed firearms dealer, and represented that he was the actual purchaser of the  
7 firearm when in fact he was acquiring the firearm on behalf of other defendants and co-  
8 conspirators. In connection with this purchase, MARTIN FLORES also provided a false  
9 address to further conceal the conspiracy. EDGAR ANTONIO CASAHONDA  
10 transported MARTIN FLORES to the business of the federally licensed firearms dealer to  
11 purchase the firearm.

12 On September 11, 2017, in Tucson, MARTIN FLORES purchased a firearm from a  
13 federally licensed firearms dealer, and represented that he was the actual purchaser of the  
14 firearm when in fact he was acquiring the firearm on behalf of other defendants and co-  
15 conspirators. In connection with this purchase, MARTIN FLORES also provided a false  
16 address to further conceal the conspiracy. EDGAR ANTONIO CASAHONDA  
17 transported MARTIN FLORES to the business of the federally licensed firearms dealer to  
18 purchase the firearm.

19 On September 12, 2017, in Tucson, FRANCISCO FABIAN ALEXIS ROMERO  
20 purchased four firearms from a federally licensed firearms dealer, and represented that he  
21 was the actual purchaser of the firearms when in fact he was acquiring the firearms on  
22 behalf of EDGAR ANTONIO CASAHONDA. Furthermore, EDGAR ANTONIO  
23 CASAHONDA provided FRANCISCO FABIAN ALEXIS ROMERO with the funds and  
24 directions for the purchase of the firearms, and transported FRANCISCO FABIAN  
25 ALEXIS ROMERO from Mexico to the business of the federally licensed firearms dealer  
26 to purchase the firearms. EDGAR ANTONIO CASAHONDA and FRANCISCO  
27 FABIAN ALEXIS ROMERO acquired these firearms with the intent that they be smuggled  
28 from the United States into Mexico.

1 On November 6, 2017, agents with the United States Department of Justice, Bureau  
2 of Alcohol, Tobacco, Firearms and Explosives, attempted to interview EDGAR  
3 ANTONIO CASAHONDA in connection with his involvement in this conspiracy.  
4 EDGAR ANTONIO CASAHONDA repeatedly denied that he was "Edgar Casahonda"  
5 and stated that "Edgar" was currently at work, in attempt to further conceal the  
6 conspiracy. EDGAR ANTONIO CASAHONDA was subsequently positively identified.

7 All in violation of 18 U.S.C. Section 371.

8 **FORFEITURE ALLEGATION**

9 Upon conviction of one or more of the offenses alleged in Counts 1 through 28 of  
10 this Indictment, the defendants, EDGAR ANTONIO CASAHONDA, ANTONIO  
11 ADRIAN NIETO MACIAS, JOSE RODRIGUEZ SAN MIGUEL, MARTIN FLORES,  
12 JESUS DE LA CRUZ MORENO, CESAR ERNESTO LOREA RUBIO, and  
13 FRANCISCO FABIAN ALEXIS ROMERO, shall forfeit to the United States:

14 a) pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28,  
15 United States Code, Section 2461(c), any property, real or personal, which constitutes or  
16 is derived from proceeds traceable to a violation of Title 18, United States Code, Sections  
17 2, 371, 554, 924(a)(1)(A), or a conspiracy to commit such offense; and

18 b) pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28,  
19 United States Code, Section 2461(c) any firearms and ammunition involved in the  
20 commission of an offense in violation of Title 18, United States Code, Section 922,  
21 including, but not limited to:

- 22
- 23 • Century Arms International, model AK63DS, 7.62x39mm caliber rifle, serial  
24 number AK63DS-FO3195
  - 25 • Colt, model M4 Carbine, 5.56mm caliber rifle, serial number LE438999
  - 26 • Century Arms International, model N-PAP DF, 7.62x39mm caliber rifle, serial  
27 number NPDP011269
  - 28 • Colt, model M4 Carbine, 5.56mm caliber rifle, serial number LE561596
  - Colt, model M4 Carbine, .223/5.56mm caliber rifle, serial number LE561074
  - Century Arms International, model N-PAP, 7.62x39 mm caliber rifle, serial number  
NPDP010953
  - Colt, model M4 Carbine, .223/5.56mm caliber rifle, serial number LE510229
  - Century Arms International, model AK63DS, 7.62x39mm caliber rifle, serial  
number AK63DS-F04552
  - Colt, model LE6920, 5.56mm caliber rifle, serial number LE416962

- Colt, model LE6920, 5.56mm caliber rifle, serial number LE413704
- Colt, model M4 Carbine, 5.56mm caliber rifle, serial number LE561836
- Colt, model LE6920, 5.56mm caliber rifle, serial number LE413797
- Colt, model M4 Carbine, .223/5.56mm caliber rifle, serial number LE564127
- Century Arms International, model N-PAP, 7.62x39mm caliber rifle, serial number N-PAP056740
- Colt, model 6920, 5.56mm caliber rifle, serial number LE452151
- Century Arms International, model RAS47, 7.62x39mm caliber rifle, serial number RAS47085010
- Colt, model M4 Carbine, 5.56mm caliber rifle, serial number LE514694
- Century Arms International, model N-PAP M70, 7.62x39mm caliber rifle, serial number NPAP059675
- Century Arms International, model RAS47, 7.62x39mm caliber rifle, serial number RAS47068773
- Century Arms International, model AK-63DS, 7.62x39mm caliber rifle, serial number AK63DSF04400
- Century Arms International, model RAS47, 7.62x39mm caliber pistol, serial number RAS47P001939

If any of the property described above, as a result of any act or omission of the defendants: a) cannot be located upon the exercise of due diligence; b) has been transferred or sold to, or deposited with, a third party; c) has been placed beyond the jurisdiction of the court; d) has been substantially diminished in value; or e) has been commingled with other property which cannot be divided without difficulty, it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property, including, but not limited to, all property, both real and personal, owned by the defendants.

All pursuant to Title 18, United States Code, Sections 924(d)(1), 981(a)(1)(C); and Title 28, United States Code, Section 2461(c) and Rule 32.2(a), Federal Rules of Criminal Procedure.

A TRUE BILL

/s/  
Presiding Juror

ELIZABETH A. STRANGE  
First Assistant United States Attorney  
District of Arizona

/s/  
Assistant U.S. Attorney

Dated: December 6, 2017

REDACTED FOR  
PUBLIC DISCLOSURE